

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

X

CHRISTINE ALBERTO,

Civil Action No. 1:15-cv-9449

Plaintiff,

-against-

THE CITY OF NEW YORK; NICHOLAS ESTAVILLO OF  
THE NEW YORK CITY POLICE DEPARTMENT;  
MICHAEL MORALES OF THE NEW YORK CITY POLICE  
DEPARTMENT; CONRAD PERRY OF THE NEW YORK  
CITY POLICE DEPARTMENT,

Defendants.

X

**[Proposed]**

**CONSENT MOTION TO EXTEND DISCOVERY DEADLINES**

This cause is before the court upon the request of Plaintiff Christine Alberto hereby respectfully move the Court for an agreed order extending the time for compliance with the Court's mandatory discovery deadlines under paragraphs 7 and 8 of the Court's Discovery Order. Plaintiff seeks a 60-day extension to comply with the requirements.

Plaintiff has requested the extension because it is supplementing responses to Defendant's discovery requests and to provide more time for both parties to propound further discovery requests if needed.

Plaintiff's deposition was noticed for on or about April 25, 2017, however, Plaintiff was unable to appear and indicated that she would be available after the close of discovery. In light of these representations, Defendants have consented to Plaintiff's request for an extension of time to complete discovery.

In light of the foregoing, the parties have agreed as follows:

1. The parties agree to a 60-day extension of time to comply with the Court's discovery deadlines under Paragraphs 7 and 8 of the Court's Discovery Order until July 11, 2017.

2. The parties agree that Plaintiff will provide responses to Defendants' First Set of Interrogatories, which were served on February 27, 2017, including the identification of documents by bates ranges, subject to each of the Plaintiff's general and specific objections.

Counsel for City of New York does not oppose these requests.

Accordingly, Plaintiff respectfully requests that the Court enter an order in accordance with the agreement detailed above.

Dated: May 11, 2017

Respectfully submitted,

/s/ Montell Figgins, Esq.  
Montell Figgins, Esq.  
The Law Offices of Montell Figgins  
17 Academy St., Suite 305  
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(973) 242-4700 (t)  
(973) 242-4701 (f)  
*Counsel for Plaintiff*

**CERTIFICATE OF CONFERENCE**

Plaintiff have conferred by telephone and/or email with Defendant City of New York, and this Consent motion to Extend Discovery Deadlines is unopposed.

Dated: May 11, 2017

Respectfully submitted,

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*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document was filed electronically in compliance with local rules. As such this motion and proposed order was served on counsel.

Dated: May 11, 2017

Respectfully submitted,

/s/ Montell Figgins, Esq.  
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